

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA

NORTHERN DIVISION

CYNTHIA ELLISON,)	
)	
Plaintiff)	
)	
v.)	Civil Action No.
)	2:05-CV-00902-MHT-DRB
AUBURN UNIVERSITY)	
MONTGOMERY,)	
)	
Defendant)	

DEFENDANT'S OBJECTIONS TO PLAINTIFF'S
PROPOSED STIPULATION AS TO ADMISSIBILITY
OF TRIAL EXHIBITS WITHOUT FURTHER PROOF

Defendant Auburn University Montgomery, pursuant to paragraph (5) of the Court's Pretrial Order, objects to the admissibility of the following trial exhibits proposed by Plaintiff (Plaintiff proposed no stipulated admissions of fact) and does not stipulate to their admissibility into evidence. Defendant notes that it did not see Plaintiff's proposed trial exhibits until after Plaintiff filed the proposed pretrial order.

1. Deposition of Cynthia Ellison;
8. February 10, 2005 letter from Julian McPhillips to Dean Lawal and Dr. Ritvo;
9. February 10, 2005 letter to Donald Burris, EEO;
10. Plaintiff Ellison's Charge of Discrimination and attachments thereto;

13. Declaration of Brandy Holmes;
14. Affidavit of Brandy Holmes, February 14, 2005;
15. Declaration of Marquita Snow;
16. Affidavit of Marquita Snow, February 14, 2005;
17. Affidavit of Marquita Snow, April 21, 2006;
18. Affidavit of Amelia Benn, February 14, 2005;
19. Affidavit of Amelia Benn, April 24, 2006;
20. Affidavit of Darolyn Gibson, February 14, 2005;
21. Affidavit of Darolyn (Nikki) Gibson, April 21, 2006;
22. Deposition of Courtnei Ellison, June 14, 2006;
23. Deposition of Keith Ellison;
24. Declaration of Bayo Lawal;
26. Deposition of Faye Ward;
27. Affidavit of Faye Ward;
28. Changes of Current Assignment;
29. Earnings and Benefits Statements;
30. Order of Discharge;
32. Dismissal and Notice of Rights;
33. Letter from Faye Ward;
36. E-mail, Cynthia Ellison to Joe Hill Nance and back 2/24-25/04;

- 37. E-mail, Cynthia Ellison to Guin Nance, 3/1/04; and
- 38. Letter, Guin Nance to Cynthia Ellison, 3/2/2004.

AUBURN UNIVERSITY MONTGOMERY

s/Burton F. Dodd
Burton F. Dodd

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CERTIFICATE OF SERVICE

I certify that, on October 24, 2006, I electronically filed Defendant's
Objections to Plaintiff's Proposed Stipulation as to Admissibility of Trial Exhibits
Without Further Proof with the Clerk of Court using the CM/ECF system which
will automatically send e-mail notification of such filing to the following
attorneys of record:

Karen Sampson Rodgers
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AUBURN UNIVERSITY MONTGOMERY

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